11 May, 1996

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Mike Wilson, Director Department of Land and Natural Resources 1151 Punchbowl Street, Room 150 Honolulu, HI 96813

Dear Mr. Wilson:

I am writing to alert you to recent construction activities on Mauna Kea that have destroyed important areas of the summit exosystem. As a biologist I have studied the invertebrate fauna of Hawai'i for the past 25 years. In 1982, I worked with Dr. Francis Howarth of Bishop Museum on the invertebrate survey for the Mauna Kea Summit EIS. We mapped the critical habitat for the unique endemic species of hemipteran known as the Wekiu Bug, and we recommended detailed mitigation guidelines for its protection. (see attached Appendix to the Mauna Kea Summit EIS)

Until recently, it appeared that telescope and road construction was being done in a way that would cause minimal impact on the Wekiu habitat. The most recent construction activities, however, are being conducted without heed to recommendations in the EIS. On May 4th, I made a trip to the summit area, and was appalled at the extent of damage to one of the two most important Wekiu habitats. (see photos and map of impacted area)

The most severe habitat loss has occurred due to construction activities in the area of the Subaru and Keck telescopes. The <u>entire</u> center of the crater adjacent to the telescope has been bulldozed, leveled, and the crater walls cut and filled. This fill contains construction refuse. Only one side of this crater appears to be relatively undamaged. This crater is one of the <u>two most critical areas for the Weldiu population</u>, the other being the Weldiu crater itself. The damage to the crater appears, at this point, to be irreversible.

As we clearly spelled out in the EIS, it is essential to survival of the Weklu bug that the areas of loose cinder be undisturbed. The recent bulldozing, filling and cutting within the crater has crushed the cinders and buried them with fine dust particles, thus destroying the Wekiu habitat.

Additionally, the summit road adjacent to the Gemini telescope has been moved over a full road width, covering the outer slopes of the Wekiu crater with crushed cinder and dust particles. This, along with the other roads on the outer crater slopes, has destroyed a portion of the remaining Wekiu habitat.

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In all of these cases, proper planning, review and monitoring would have avoided the massive and careless ruin of this important heritage.

Why were the mitigation recommendations in the EIS ignored by those responsible for planning and construction?

Were these recommendations appended to the CDUP and made a condition to the scope of work?

Did the CDUA or amendments approved by DLNR permit this needless damage to the Wekiu habitat?

Why didn't the DLNR require that biologists or enforcement personnel be on site to ensure that essential habitat be protected?

Since the IfA has demonstrated its disregard for the biological resources, is it competent to protect archaeological resources?

The most recent management agreement between the DLNR and the IfA calls for a survey of biological and cultural resources. It is unfortunate that this biological survey will now occur after the loss of major Wekin habitat.

These resources, once lost, can never be replaced. I strongly recommend that an immediate moratorium should be placed on any further construction activities until the biological and archaeological surveys are completed. It is absolutely essential that the IfA not be allowed to continue destroying the important resources of this mountain. Mauna Kea is not the private kuleana of the IfA. It is a paramount feature with unique cultural, biological and geological values.

I also recommend that before construction proceed, a biologist and an archaeologist with experience and training on Mauna Kea must be on site to ensure that further obliteration of Mauna Kea's priceless treasures be prevented.

It is necessary that a new EIS be initiated immediately, not "after the year 2000", since the initial EIS, conducted fourteen years ago in 1982, did not address the current and projected construction activities.

Sincerely,

Fred D. Stone, Ph.D.
Division of Math and Natural Sciences
Hawai'i Community College
Hilo, HI 96720

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Cc. Ben Cayetano, Governor, State of Hawai'i
Kenneth P. Mortimer, President, University of Hawai'i
Don Hall, Director of Institute for Astronomy
Gary Gill, Office of Environmental Quality Control
Sam Lemmo, Office of Conservation and Environmental Affairs, DLNR
Betsy Gagne, Director of Natural Area Reserves, DLNR
Bill Stormont, Natural Area Reserves Manager, Hawai'i Island
Ross Cordy, State Historic Preservation Division, DLNR
Lawrence Terlep, Division of Conservation and Resources Enforcement, Hawai'i Island
Dean Uchida, Division of Land Management, DLNR
Virginia Goldstein, Planning Director, Hawai'i County
Chris Yuen, Board of Land and Natural Resources, DLNR
Adam Asquith, U.S. Fish and Wildlife Service, National Biological Survey, DOI
Dr. Francis Howarth, B.P. Bishop Museum
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